

1 ETHAN A. BALOGH, No. 172224
2 BALOGH & CO., APC
3 100 Pine Street, Suite 1250
4 San Francisco, CA 94111
5 Telephone: 415.391.0440
6 Facsimile: 415.373.3901
7 eab@balcolaw.com

8 Attorneys for Defendant
9 JINNIE CHAO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 JINNIE CHAO,
17 Defendant.

Case No. 16 Cr. 435 EJD

STIPULATION AND PROPOSED ORDER RE
REVISED SCHEDULE

Before the Honorable Edward J. Davila
United States District Judge

1 Defendant Jinnie Chao, by and through her counsel, respectfully move to reset the briefing under
2 the Court's scheduling order as set forth in ECF 188. The United States of America, represented by
3 Assistant United States Attorneys Maia Perez and Anne Hsieh, concurs with this request.

4 The bases for this Stipulation are as follows: the parties have agreed to a Pretrial Diversion
5 agreement, which contemplates that Ms. Chao wire restitution to the Clerk of Court no later than August
6 24, 2022. Because the hearing on the pretrial motions is currently set for August 22, the parties
7 respectfully contend that judicial economy supports resetting the Pretrial Conference to August 29,
8 2022, at which point the parties can provide the court an updated status on Ms. Chao's compliance with
9 the diversion agreement and the potential resolution of this case. The parties also ask the Court to reset
10 the hearing on the unsealing of civil transcripts on the same bases. For these reasons, the parties
11 respectfully move the Court to reset the Pretrial Conference from August 22 to August 29, 2022.

12 Dated: August 16, 2022

Respectfully submitted,

13
14 /s/
15 ETHAN A. BALOGH
16 Counsel for Defendant Jinnie Chao

17
18 /s/
19 MAIA PEREZ
20 ANNE HSIEH
21 Assistant United States Attorneys
22
23
24
25
26

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and for good cause shown, the Court HEREBY ORDERS that the Pretrial Conference scheduled for August 22, 2022 shall be rescheduled for August 29, 2022, at 9:00 a.m. The Court shall address the parties' motions in limine and for unsealing at that time.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE EDWARD J. DAVILA
United States District Judge